

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

YUETING JIA,<sup>1</sup>

Debtor.

Chapter 11

Case No. 19-12220-KBO

Hearing Date: December 18, 2019 at 10:00 a.m. (ET)  
Obj. Deadline: December 13, 2019 at 4:00 p.m. (ET)

Re: D.I. 109

**SHANGHAI LAN CAI ASSET MANAGEMENT CO, LTD.’S OBJECTION TO AND  
RESERVATION OF RIGHTS IN CONNECTION WITH THE DEBTOR’S MOTION  
FOR AN ORDER (I) APPROVING DISCLOSURE STATEMENT, (II) APPROVING  
VOTING AND TABULATION PROCEDURES, (III) SETTING CONFIRMATION  
HEARING AND RELATED DEADLINES AND  
(IV) GRANTING RELATED RELIEF**

Creditor Shanghai Lan Cai Asset Management Co, Ltd. submits this objection to and reservation of rights related to Yueting Jia’s (“Jia” or the “Debtor”) *Motion for an Order (I) Approving Disclosure Statement, (II) Approving Voting and Tabulation Procedures, (III) Setting Confirmation Hearing and Related Deadlines and (IV) Granting Related Relief* [Dkt. No. 109] (the “Disclosure Statement Motion”) and respectfully represents as follows:

Currently pending before the Court is Shanghai Lan Cai’s *Motion (I) to Dismiss the Debtor’s Chapter 11 Case or, Alternatively (II) to Transfer Venue to the Central District of California* (the “Motion to Dismiss”) [Dkt. No. 89]. As a matter of judicial efficiency and economy, the Court should first determine whether this case should be dismissed or, alternatively, transferred to the Central District of California before considering the Disclosure Statement Motion.

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<sup>1</sup> The last four digits of the Debtor’s federal tax identification number are 8972. The Debtor’s mailing address is 91 Marguerite Drive, Rancho Palos Verdes, CA 90275.

Shanghai Lan Cai respectfully requests that this Court deny the Disclosure Statement Motion<sup>2</sup> or otherwise hold it in abeyance until after the Motion to Dismiss is resolved. Shanghai Lan Cai further reserves all rights to supplement this objection, including as the adequacy and accuracy of the information contained in the proposed disclosure statement.

Dated: December 13, 2019

Respectfully submitted,

**THE ROSNER LAW GROUP LLC**

/s/ Zhao Liu

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Management Co, Ltd.*

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<sup>2</sup> As the Official Committee of Unsecured Committee (the “Committee”) has pointed out, it is currently “impossible” to assess the disclosure statement at this time based on the limited information provided by Jia. See Official Committee of Unsecured Creditors’ Response to Shanghai Lan Cai Asset Management Co, Ltd.’s Motion (I) to Dismiss the Debtor’s Chapter 11 Case or, Alternatively, (II) to Transfer Venue to the Central District of California [Dkt. No. 111] ¶ 11.